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Counsel for Defendant
 World Wrestling Entertainment, Inc.

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

MLW MEDIA LLC,

Plaintiff,

v.

WORLD WRESTLING
 ENTERTAINMENT, INC.,

Defendant.

) CASE NO. 5:22-cv-00179-EJD

)

) **STIPULATION AND [PROPOSED**
) **ORDER] TO LIFT STAY OF DISCOVERY**
) **AND AMENDING CASE MANAGEMENT**
) **ORDER**

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) Action Filed: January 11, 2022

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**STIPULATION AND [PROPOSED ORDER] TO LIFT STAY OF DISCOVERY AND
 AMENDING CASE MANAGEMENT ORDER**

Case No. 5:22-cv-00179-EJD

RECITALS

WHEREAS, the Parties submitted a Joint Rule 26(f) Report, with an agreed-upon schedule for discovery and pre-trial motion practice;

WHEREAS, the Court issued a Case Management Order (ECF 49) on December 13, 2022;

WHEREAS, the Court granted Defendant World Wrestling Entertainment, Inc.'s ("WWE") Motion to Dismiss Plaintiff's ("MLW") complaint and granted MLW leave to amend its complaint on February 13, 2023, and issued a discovery stay in this action (ECF 62);

WHEREAS, Defendant WWE's Motion to Dismiss Plaintiff MLW's First Amended Complaint ("Motion") was denied on June 15, 2023 (ECF 78);

WHEREAS, given the disposition of the Motion, the reasons for staying discovery are no longer applicable;

WHEREAS, WWE and MLW agreed to new deadlines consistent with the Court's Case Management Order for fact and expert discovery, and dispositive motions;

NOW, THEREFORE, the parties do further stipulate and respectfully request that:

STIPULATION

1. The parties hereby stipulate to lift the discovery stay originally imposed by the Court on February 13, 2023 (ECF 62).

2. The parties respectfully request the Court to adopt the following proposed revised case management schedule:

EVENT	DEADLINE
Joint Trial Setting Conference Statement	June 17, 2024
Trial Setting Conference	June 27, 2024
Fact Discovery Cutoff	July 31, 2024
Designation of Plaintiff's Opening Experts with Reports	August 30, 2024
Designation of Defendant's Rebuttal Experts with Reports	October 14, 2024
Last Day for Plaintiff to Serve Reply Expert Reports	November 27, 2024
Expert Discovery Cutoff	January 12, 2025
Deadline for Filing Dispositive Motions	February 11, 2025
Deadline for Filing Oppositions to Dispositive Motions	March 31, 2025
Deadline for Filing Replies to Dispositive Motions	April 28, 2025
Hearing on Anticipated Dispositive Motion(s) ¹	May 22, 2025 at 9:00 a.m.

¹ The actual hearing on the motion may be noticed for a date subsequent after contacting Judge Davila's courtroom deputy.

KASOWITZ BENSON TORRES LLP

Dated: July 6, 2023

By: /s/ Christine A. Montenegro

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Counsel for Plaintiff MLW Media LLC

PAUL, WEISS, RIFKIND, WHARTON &
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Dated: July 6, 2023

By: /s/ Walter F. Brown

Walter F. Brown (SBN 130248)
Karen L. Dunn (*pro hac vice pending*)
William A. Isaacson (*pro hac vice pending*)
William B. Michael (*pro hac vice pending*)
Brette Tannenbaum (*pro hac vice pending*)

Counsel for Defendant
World Wrestling Entertainment, Inc.

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: _____

Edward J. Davila
United States District Judge